

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

LAST UPDATE JULY 2004

RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA725)

Current Human Exposures Under Control

Facility Name: Noveon Kalama, Inc.
Facility Address: 1296 NW Third Street, Kalama, Washington, 98625
Facility EPA ID #: WAD 09289 9574

Subarea: WEST IMPACTED AREA

1. Has all available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been considered in this EI determination?

- X If yes - check here and continue with #2 below.
If no - re-evaluate existing data, or
if data are not available skip to #6 and enter "IN" (more information needed) status code.

EI determinations are intended to be a "snapshot" of current site conditions, and should NOT require additional data to be gathered at the time an EI determination is made. Even if available data are clearly insufficient to determine the nature and extent of contamination or whether cleanup standards are met, it is perfectly acceptable to check "yes" for question #1 as long as whatever data currently available has been considered. When data currently available are considered but are insufficient for EI determinations, such a conclusion should be indicated in question 3 for pathways and question 4 for exposures.
Note: Even though only currently available data should be used for EI determinations, the process of making EI determinations may well identify data gaps that need to be filled through the corrective action process.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRAs. The "Current Human Exposures Under Control" EI are for reasonably expected human exposures

under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

In many cases, available sampling and analytical data will be insufficient to fully document whether or not contaminant levels in the various media are above or below appropriate risk-based levels. For purposes of making EI determinations, it is entirely appropriate to use sound professional judgement as to whether particular media are or are not contaminated. For example, at a site with metal contamination in groundwater, professional judgement could easily be used to determine that no air (indoor or outdoor) contamination had occurred. This is particularly important when a phased approach is used for site characterization or corrective action - if characterization of a particular portion of a site has been deferred under a phased approach on the basis that that area is not believed to be contaminated and this belief is reasonably supported by an analysis of historical activities, process knowledge or other information, then it is quite reasonable to conclude that media in that area are not "contaminated" as part of a site-wide EI determination. Should data contradicting the initial phased-investigation presumption be gathered later in the site characterization process, it can easily be reflected in an updated EI determination. Deferral of a particular area as being low priority but still or likely to be contaminated should be reflected by a "no" or "in" EI.

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **“contaminated”**¹ above appropriately protective risk-based “levels” (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	Yes	No	?	Rationale / Key Contaminants
Groundwater	<u>X</u>	_____	_____	<u>benzene/toluene/diphenyl oxide</u>
Air (indoors) ²	_____	<u>X</u>	_____	_____
Surface Soil (e.g., <2 ft)	_____	<u>X</u>	_____	_____
Surface Water	_____	<u>X</u>	_____	_____
Sediment	_____	_____	_____	_____
Subsurf. Soil (e.g., >2 ft)	<u>X</u>	_____	_____	<u>benzene/toluene</u>
Air (outdoors)	_____	<u>X</u>	_____	_____

_____ If no (for all media) - skip to #6, and enter “YE,” status code after providing or citing appropriate “levels,” and referencing sufficient supporting documentation demonstrating that these “levels” are not exceeded.

X If yes (for any media) - continue after identifying key contaminants in each “contaminated” medium, citing appropriate “levels” (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

_____ If unknown (for any media) - skip to #6 and enter “IN” status code.

Footnotes:

¹ “Contamination” and “contaminated” describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based “levels” (for the media, that identify risks within the acceptable risk range).

² Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

Rationale and Reference(s):

Sampling results indicate that concentrations of benzene and toluene exceed MTCA cleanup levels in subsurface soils and groundwater underlying the West Impacted Area. (Ref. Remedial Investigation, Revision 2, BF Goodrich Kalama Facility, December 2000.) In October 2002 the measured concentration of toluene in a groundwater sample taken in monitoring well MW-244 adjacent to the Columbia River, where exposure of recreational users is a potential concern, was 71,000 micrograms per liter indicating the potential discharge of this constituent into the Columbia River (ref. Interim Corrective Measure Annual Monitoring Report, July 2003.) However, results of subsequent samples obtained semiannually at MW-244, including the most recent sampling event in April 2004 show concentrations of toluene at minimal levels or “non-detect”. Concentrations of benzene at this location have been “non-detect” or minimally above (i.e. 1.8 micrograms per liter vs. the National Toxics Rule criteria of 1.2 micrograms per liter) during this period. Therefore “surface water”, i.e. Columbia River, is not presently considered to be “contaminated” based on the recent monitoring results (ref. “Noveon Kalama Quarterly Progress Report for April for June 2004”),.

The rationale/key contaminants should have a brief note of the “principle threat” contaminants (those that most significantly drive cleanup decisions), as well as a reference to key documents, if any. A note as to which particular risk-based standard is being used as the basis of comparison should also be included. For complex documents, a note to the particular section, table, etc. from which data or standards are selected should be provided, as it is often difficult to verify data out of context.

Semantic Alert: In this instance, saying "NO" complete pathways exist translates to a "YE" environmental indicator. Go figure.

3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

- If no (pathways are not complete for any contaminated media-receptor combination), skip to #6, and enter "YE" status code, after explaining or referencing condition(s) in-place, whether natural or manmade, preventing a complete exposure pathway from each contaminated medium.
- If yes (pathways are complete for any "Contaminated" Media-Human Receptor combination) continue after providing supporting explanation.
- If unknown (for any media) - skip to #6 and enter "IN" status code.

Summary Exposure Pathway Evaluation Table

Potential **Human Receptors** (Under Current Conditions)

"Contaminated" Media	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food ³
Groundwater	___	<u>no</u>	___	<u>no</u>	___	___	___
Air (indoors)	___	<u>no</u>	___	___	___	___	___
Soil (surface, e.g., <2 ft)	___	___	___	___	___	___	___
Surface Water	___	___	___	___	___	<u>no</u>	<u>no</u>
For sediments (if not other media like surface or groundwater), exposure should consider the potential for subsistence food source exposures, in addition to traditional exposure routes such as direct contact or direct ingestion.							
Sediment	___	___	___	___	___	___	___
Soil (subsurface e.g., >2 ft)	___	<u>no</u>	___	<u>no</u>	___	___	___
Air (outdoors)	___	___	___	<u>no</u>	___	___	___

³ Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

Rationale and References:

Excavation associated with construction activities may potentially expose construction workers to contaminated subsurface soils and groundwater in the upper aquifer. However, the facility has comprehensive health and safety procedures in place and, therefore, it is presumed that construction workers conducting excavation activities in areas of identified subsurface soil and/or groundwater contamination will be notified and wear adequate personal protective equipment (PPE) when working in these areas. Ordinary site workers not involved in construction activities will not be exposed to contaminated subsurface soils. Groundwater underlying the West Impacted Area is not used for potable water. Since there are no habitable structures in the West Impacted Area indoor air is not an exposure pathway. Additionally, an air monitoring survey for benzene and toluene in both indoor and outdoor air conducted by the facility in 1991 showed that measured concentrations of these constituents were below threshold values for employee exposure at all locations. (Ref. Remedial Investigation, Revision 2, BF Goodrich Kalama Facility, December 2000 and Feasibility Study Work Plan, Revision 2, December 2000.)

As stated above in the rationale for Item 2, "surface water", i.e. Columbia River, is not presently considered to be "contaminated" based on the recent monitoring results (ref. "Noveon Kalama Quarterly Progress Report for April for June 2004"). Therefore there are no completed pathways for recreational use or consumption of fish.

- 4 Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **“significant”**⁴ (i.e., potentially “unacceptable” because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable “levels” (used to identify the “contamination”); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable “levels”) could result in greater than acceptable risks)?

In general, EI’s (if not cleanup standards themselves) can be met through a combination of reduction of contaminant concentrations (assuming that concentrations have been unacceptable) and (physical) engineering or institutional controls that interrupt an exposure pathway. For purposes of EI determinations, however, institutional or engineering controls do not need to have the sophistication, permanence, or legal defensibility as would be necessary for a final corrective action remedy. Rather, they need to be functional and reasonable - should the controls later be found to be no longer effective, the finding can easily be reflected in an updated EI determination.

An example might be the existence of off-site groundwater contamination that might pose risks to utility workers outside of the facility boundary. ~~In this instance, evidence of an agreement between the facility and the utility that excavations would not occur in the contaminated area without appropriate protective gear would be acceptable for meeting the human exposures controlled EI.~~ See Summary Alert above.

- 4 If there is any question on whether the identified exposures are “significant” (i.e., potentially “unacceptable”) consult a human health Risk Assessment specialist with appropriate education, training and experience.

_____ If no (exposures can not be reasonably expected to be significant (i.e., potentially “unacceptable”) for any complete exposure pathway) - skip to #6 and enter “YE” status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”

_____ If yes (exposures could be reasonably expected to be “significant” (i.e., potentially “unacceptable”) for any complete exposure pathway) - continue after providing a description (of each potentially “unacceptable” exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”

_____ If unknown (for any complete pathway) - skip to #6 and enter “IN” status code

5. Can the “significant” **exposures** (identified in #4) be shown to be within **acceptable** limits?

_____ If yes (all “significant” exposures have been shown to be within acceptable limits) - continue and enter “YE” after summarizing and referencing documentation justifying why all “significant” exposures to “contamination” are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

_____ If no (there are current exposures that can be reasonably expected to be “unacceptable”)- continue and enter “NO” status code after providing a description of each potentially “unacceptable” exposure.

_____ If unknown (for any potentially “unacceptable” exposure) - continue and enter “IN” status code

The response to this question should include a brief description of the analysis and assumptions used in arriving at whatever conclusion is reached. The description does not have to be particularly detailed, but it should allow the reader to gain a basic understanding of the reasoning employed by the decision-maker.

**RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA725)**

Current Human Exposures Under Control

6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

- YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the **Noveon Kalama, Inc.** facility (**West Impacted Area**), EPA ID #**WAD092899574**, located at **Kalama, Washington** under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.
- NO - "Current Human Exposures" are NOT "Under Control."
- IN - More information is needed to make a determination.

Completed by _____ Date _____
Leon J. Wilhelm
Environmental Engineer

Supervisor _____ Date _____
K Seiler
Section Supervisor
Department of Ecology
Southwest Regional Office

Locations where References may be found:

Site Files for RCRA Corrective Action at this facility.

Contact telephone and e-mail numbers

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FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

LAST UPDATE JULY 2004

**RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA750)**

Migration of Contaminated Groundwater Under Control

Facility Name: Noveon Kalama, Inc.
Facility Address: 1296 NW Third Street, Kalama, Washington, 98625
Facility EPA ID #: WAD 09289 9574

Subarea: WEST IMPACTED AREA

1. Has **all** available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?
- If yes - check here and continue with #2 below.
- If no - re-evaluate existing data, or
- if data are not available, skip to #8 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

2. Is **groundwater** known or reasonably suspected to be “**contaminated**”¹ above appropriately protective “levels” (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

This question focuses ONLY on the movement of contaminated groundwater, not the level of contamination. A “YES” response should be arrived at if, through interpretation of groundwater flow data or sound professional judgement, groundwater contamination can be shown to not be expanding in spatial extent. It is perfectly acceptable to have a “YE” groundwater EI if:

- 1) contaminated groundwater is located off-site but not migrating further;
- 2) contaminated groundwater is contaminated above cleanup standards, but not migrating further;
- 3) natural attenuation is occurring such that the rate of attenuation (through any of the acceptable attenuation mechanisms and in accordance with EPA’s Monitored Natural Attenuation Guidance, Directive 9200.4-17 - December 1997 Use of Monitored Natural Attenuation at Corrective Action Sites) is such that the outer boundaries of the plume are not expanding.

If yes - continue after identifying key contaminants, citing appropriate “levels,” and referencing supporting documentation.

If no - skip to #8 and enter “YE” status code, after citing appropriate “levels,” and referencing supporting documentation to demonstrate that groundwater is not “contaminated.”

If unknown - skip to #8 and enter “IN” status code.

Footnotes:

¹“Contamination” and “contaminated” describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate “levels” (appropriate for the protection of the groundwater resource and its beneficial uses).

Rationale and Reference:

Sampling results indicate that concentrations of benzene and toluene exceed MTCA cleanup levels in subsurface soils and groundwater underlying the West Impacted Area. (Ref. Remedial Investigation, Revision 2, BF Goodrich Kalama Facility, December 2000.)

3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within “existing area of contaminated groundwater”² as defined by the monitoring locations designated at the time of this determination)?

If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the “existing area of groundwater contamination”²).

_____ If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the “existing area of groundwater contamination”²) - skip to #8 and enter “NO” status code, after providing an explanation.

_____ If unknown - skip to #8 and enter “IN” status code.

2 “existing area of contaminated groundwater” is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of “contamination” that can and will be sampled/tested in the future to physically verify that all “contaminated” groundwater remains within this area, and that the further migration of “contaminated” groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

Rationale:

Although results of groundwater monitoring in October 2002 at well MW-244 located adjacent to the Columbia River, showed a toluene concentration of 71,000 micrograms per liter, results of subsequent samples obtained semiannually at MW-244, including the most recent sampling event in April 2004 show concentrations of this constituent at minimal levels or “non-detect”. Concentrations of benzene at this location have been “non-detect” or at minimal concentrations above applicable surface water criteria (1.8 micrograms per liter as compared to the Toxics Rule criteria of 1.2 micrograms per liter) during this period (ref. “Noveon Kalama Quarterly Progress Report for April for June 2004”). Therefore it can be concluded that the existing interim corrective measures in place in the West Impacted Area have “stabilized” the groundwater in preventing its discharge to the Columbia River.

4. Does “contaminated” groundwater **discharge** into **surface water** bodies?

 X If yes - continue after identifying potentially affected surface water bodies.

_____ If no - skip to #7 (and enter a “YE” status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater “contamination” does not enter surface water bodies.

_____ If unknown - skip to #8 and enter “IN” status code.

Rationale:

Some groundwater with “de – minimus” contamination discharges into the Columbia River. However, note that subsequent to results of groundwater monitoring in October 2002 at well MW-244 (located adjacent to the river) showing a toluene concentration of 71,000 micrograms per liter, results of samples obtained semiannually at MW-244 since then show concentrations of this constituent at minimal levels or “non-detect”. Concentrations of benzene at this location have been “non-detect” or at minimal concentrations above applicable surface water criteria (1.8 micrograms per liter as compared to the Toxics Rule criteria of 1.2 micrograms per liter) during this period (ref. “Noveon Kalama Quarterly Progress Report for April for June 2004”).

5. Is the **discharge** of “contaminated” groundwater into surface water likely to be “**insignificant**” (i.e., the maximum concentration³ of each contaminant discharging into surface water is less than 10 times their appropriate groundwater “level,” and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

 X If yes - skip to #7 (and enter “YE” status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration³ of key contaminants discharged above their groundwater “level,” the value of the appropriate “level(s),” and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgement/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

 If no - (the discharge of “contaminated” groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration³ of each contaminant discharged above its groundwater “level,” the value of the appropriate “level(s),” and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations³ greater than 100 times their appropriate groundwater “levels,” the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

 If unknown - enter “IN” status code in #8.

³ As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

Rationale:

As stated above in the Rationale for Item #4, results of samples obtained semiannually at MW-244 since the high toluene concentrations were reported in October 2002 show concentrations of this constituent at minimal levels or “non-detect”. Concentrations of benzene at this location have been “non-detect” or at minimal concentrations above applicable surface water criteria (1.8 micrograms per liter as compared to the Toxics Rule criteria of 1.2 micrograms per liter) during this period (ref. “Noveon Kalama Quarterly Progress Report for April for June 2004”).

Therefore, it can reasonably be concluded that any presence of toluene or benzene in groundwater reaching the Columbia River would be insignificant.

6. Can the **discharge** of “contaminated” groundwater into surface water be shown to be “**currently acceptable**” (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented⁴)?

_____ If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site’s surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR 2) providing or referencing an interim-assessment,⁵ appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment “levels,” as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

_____ If no - (the discharge of “contaminated” groundwater can not be shown to be “**currently acceptable**”) - skip to #8 and enter “NO” status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

_____ If unknown - skip to 8 and enter “IN” status code.

⁴ Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

⁵ The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

**Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)**

7. Will groundwater **monitoring** / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the “existing area of contaminated groundwater?”

 X If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the “existing area of groundwater contamination.”

 If no - enter “NO” status code in #8.

 If unknown - enter “IN” status code in #8.

Rationale: Currently, quarterly hydraulic groundwater monitoring and semi-annual chemical groundwater monitoring is conducted at various locations including locations adjacent to the Columbia River downgradient of the currently installed interim corrective measures. This monitoring will continue upon implementation of the final cleanup remedies at the site.

**Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)**

8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the **Noveon Kalama, Inc.** facility (**West Impacted Area**), EPA ID #**WAD092899574**, located at **Kalama, Washington**. Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater" This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

NO - Unacceptable migration of contaminated groundwater is observed or expected.

IN - More information is needed to make a determination.

Completed by _____ Date _____
Leon J. Wilhelm
Environmental Engineer

Supervisor _____ Date _____
K Seiler
Section Supervisor
Department of Ecology
Southwest Regional Office

Locations where References may be found:

Site Files for RCRA Corrective Action at this facility.

Contact telephone and e-mail numbers

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